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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FABIOLA FRAGOSO, individually;

Plaintiff,

vs.

Case No.: 2:22-cv-01507-CDS-EJY

WAL-MART, INC., a foreign corporation;
DOE EMPLOYEES; DOE MANAGERS;
DOES I-XX, inclusive; and ROE
CORPORATIONS I-XX, inclusive,

Defendants.

**STIPULATION AND ORDER TO
EXTEND JOINT PRETRIAL ORDER
DEADLINE (FIRST REQUEST)**

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Joint Pretrial Order deadline in the above-captioned matter. Good cause exists to extend the remaining deadline for the reasons outlined herein.

A. Reason For the Requested Extension

On December 6, 2024, this Court entered an Order Granting in Part Defendant's Motion for Summary Judgment and Denying Plaintiff's Motion for Summary Judgment. Accordingly, the stay on deadline to file the Joint Pretrial Order was lifted and, pursuant to LR 26-1 (b)(5), the deadline for filing said Order became January 6, 2024. On December 16, 2024 the parties held a meet and confer regarding an extension of time to submit the Joint Pretrial Order in this case.

In their meet and confer, counsel for the respective parties agreed that additional time to complete the Pretrial Order is needed as their December calendars are filled with prior

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engagements along with general unavailability due to the holiday season. Plaintiff's counsel will be out of the country for a large portion of the remainder of the month. Defense counsel has similar scheduling conflicts. Additionally, based upon the voluminous number of medical records, deposition transcripts, and other records involved in the present matter, the parties require additional time to properly complete and submit the Joint Pretrial Order. The parties have agreed that it would be impracticable to properly complete said Order within the current deadline.

B. Proposed Revised Pretrial Order Schedule

The Joint Pretrial Order is due on January 6, 2025 and the parties are requesting a thirty (30) day extension moving the deadline to February 6, 2025. This request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to adequately prepare their pretrial order and meet and confer about the contents of the Joint Pretrial Order, as well as the parties' intended exhibits. The parties respectfully submit that the reasons set forth above constitute compelling reasons and good cause for the extension.

WHEREFORE, the parties respectfully request that this Court extend the deadline for submitting their Joint Pretrial Order from the current deadline as outlined above.

DATED this 16th day of December, 2024.

DATED this 16th day of December, 2024.

BLACKBURN WIRTH, LLP

HALL & EVANS, LLC

/s/ Tyler Bixby

/s/ Kurt Bonds

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Fragoso v. Walmart, Inc.
Case No.: 2:22-cv-01507-CDS-EJY
SAO to Extend Joint Pretrial
Order Deadline (First Request)

ORDER

IT IS SO ORDERED.

DATED this 16th day of December, 2024.



UNITED STATES MAGISTRATE JUDGE

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